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EVENSTAR MASTER FUND SPC and

13 EVENSTAR SPECIAL SITUATIONS LIMITED

14
15 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

16 *In re Ex Parte* Application of

17 EVENSTAR MASTER FUND SPC for and on

behalf of EVENSTAR MASTER SUB-FUND I

18 SEGREGATED PORTFOLIO; and

EVENSTAR SPECIAL SITUATIONS

19 LIMITED,

20 Applicant,

21 For an Order Pursuant to 28 U.S.C. § 1782 to

22 Obtain Discovery from JING CAO MO for Use

in a Foreign Proceeding.

CASE NO.: 2:20-CV-02333-KJD-BNW

**STIPULATION TO EXTEND BRIEFING ON
EVENSTAR'S MOTION TO COMPEL**

FIRST REQUEST TO EXTEND

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27 Whereas on January 14, 2021, the Court granted Applicants' *ex parte* application to issue
28 certain subpoenas to "Jing Cao Mo" pursuant to 28 U.S.C. § 1782 (ECF No. 10);

1 Whereas on February 21, 2021, Applicants submitted affidavits of service of such subpoenas
2 (ECF No. 15);

3 Whereas on April 8, 2021, Applicants brought a motion to compel (ECF No. 18);

4 Whereas on April 12, 2021, this Court set a hearing on the motion to occur by
5 videoconference on June 6, 2021;

6 Whereas counsel for Applicants and Jing Cao have conferred in good faith concerning the
7 timing of the briefing on Applicants' motion to compel, and any motion by Ms. Cao to quash or
8 modify the subpoenas that may be brought by Ms. Cao during the pendency of the motion to compel;

9 Whereas, the parties agree that the modest extensions of the briefing deadlines may be
10 helpful in view of the nature of the issues in the case; and

11 Whereas the request is not for purposes of delay, the parties hereby stipulate to the following
12 proposed briefing schedule, which closes briefing well in advance of the hearing set by the Court:

13 **May 7, 2021** - Deadline for Ms. Cao to file (i) papers in opposition to Applicants' motion to
14 compel (ECF No. 18) and (ii) any motion to quash or modify the subpoenas;

15 In the event Ms. Cao files a motion to quash or modify the subpoenas, the deadline for
16 Applicants' Reply in Support of its Motion to Compel and response to any motion to quash shall be
17 **May 21, 2021**, and the deadline for Ms. Cao's reply papers in support of any motion to quash or
18 modify the subpoenas shall be **May 28, 2021**;

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1 In the event Ms. Cao does not file a motion to quash or modify, the deadline for Applicants'
2 Reply in Support of its Motion to Compel shall be **May 17, 2021**.

3 Respectfully submitted on this 19th day of April, 2021.

4 LANKLER SIFFERT & WOHL LLP

MORRIS LAW GROUP

5 *By: /s/ Matthew G. Coogan*

By: /s/ Steve Morris

6 Matthew G. Coogan (*Will Comply With*
7 *L.R. 11-2 Within 14 Days*)
8 John S. Siffert (*Will Comply With L.R. 11-2*
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EVENSTAR MASTER FUND SPC and
EVENSTAR SPECIAL SITUATIONS
LIMITED

Attorneys for Subpoena Recipient
JING CAO

18 **ORDER**

19 IT IS SO ORDERED.

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21 HONORABLE BRENDA N. WEKSLER
22 UNITED STATES MAGISTRATE JUDGE

23 Date: April 23, 2021
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